

In The United States District Court
For The District of Maryland

U.S. DISTRICT COURT
FILED
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Ronald G. Bailey - Et
(Plaintiff)

vs.

Civil Action #

Housing Authority of
Baltimore City, et al

1:15-CV-02063-PJB

Opposition To Renewed Motion To Dismiss As
Sanctions For Plaintiff's Failure To Provide Complete
Answers To Interrogatories And Respond To Request For
Production And Certification Of Good Faith Efforts

Plaintiff, Ronald G. Bailey - Et, making as the Pro
Se Litigant do hereby solemnly affirm pursuant 28 USC
1746 the foregoing stated facts:

① On April 9, 2018 Defendants, without a scheduling order in place by the Honorable, untimely served Interrogatories and Request for Production of Documents upon this Pro Se litigant

② Unaccustomed to this procedure, as a pro se litigant, Plaintiff was compelled to respond or face summary dismissal by usage of bad faith procedure of which this case is the essence thereof and it is because of procedural abuse that this lawsuit was initiated.

③ Plaintiff never received this letter dated May 30, 2018 as Plaintiff recalls

④ Plaintiff, to the best of his ability, and without "Appointment of Counsel" has thus far put forth Plaintiff's sincere intentions in bringing forth

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his case; although, Plaintiff in totality lacks the knowledge and skill to conduct a proper discovery proceeding without an attorney. Nevertheless, Plaintiff has time and time again informed the Defendants of the witnesses or defendants involved in this remaining issue left by the U.S. Court of Appeals for the Fourth Circuit i.e. "Does the Plaintiff have a liberty interest in his arbitration hearing?" Therefore, Plaintiff provided the Defendants with "The Master Agreement Between The Housing Authority and the Plaintiff's Union AFL-CIO Local 647" whereby said agreement clearly stipulates Plaintiff's right to an arbitration hearing and his manifested identity

interest in same. Moreover, Plaintiff named
the witnesses that will be called in this matter
on the side of the Defendants whom are:
Ms. Kimberly Graham, Ms. Washington, Ms.
Sharon Laine, and Mr. Anthony Coates. All
of these Defendants knew or should have known that
the actions these Defendants had taken against
Mr. Small ~~Barley-E~~ violated Mr. Barley-E's
inalienable secured human rights, constitutional
rights, and Mr. Barley-E's rights given Mr.
Barley-E via a secured contract and agreement
between Defendants and Plaintiff (See: Master
Agreement Article 27)

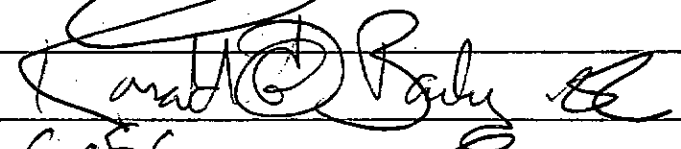
Wherefore, if the Defendants are so dissatisfied by this Poor Litigant's honest and earnest attempts to provide to them something impossible, then "Appointment of Counsel" can cure the matter; however, playing Fast and Loose and engaging in an exercise of futility, the Defendants keep opposing Plaintiff's Motion For Appointment of Counsel making Plaintiff feel as "damned if do and damned if he doesn't."

Wherefore Still, pursuant to Fed R. Civ. P. Rule 56(h), the Defendants have done nothing but redundantly sent forth Declarations to Bad Faith knowing Plaintiff has provided Defendants the Master Agreement and has named the key De

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Defendants left in this civil action involving
Plaintiff's "Liberty Interest in Plaintiff's
Arbitration Hearing!"

Wherefore Still, Plaintiff seeks
this Court to grant Plaintiff Summary Judgment
in his favor or in the Alternative at least
grant Plaintiff an attorney and render unto this
Citizen of First Class Status his day in
Court without the rise and ticking of
procedural and summary dismissal which is
entire at this point and juncture of these
proceedings

Sincerely Respectful
March 19, 2019 
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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Case No.

15-CV-0263 ER

CERTIFICATE OF SERVICE

I hereby certify that on March 19th 2019, a copy of Opposition
to Renewed Motion to Dismiss for Failure to Plead Complete Denial
which was electronically filed in this case on March 20, 2019, was mailed via
first class mail, postage prepaid, to Carric E. King, Attorney, 222 Carthouse Court,
Suite 2F, Baltimore, Md 21204

Date

March 19, 2019

Signature

Carric E. King
Printed Name and Bar Number

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